



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL  
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BOSTON, MASSACHUSETTS 02108

MAURA HEALEY  
ATTORNEY GENERAL

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March 30, 2022

Shonda D. Green, Secretary  
Department of Telecommunications and Cable  
1000 Washington Street, Suite 600  
Boston, MA 02118-6500

Re: *Petition of the State 911 Department for Approval of Fiscal Year ("FY") 2022  
Expenditures, FY 2023 Development Grant Amount, FY Incentive Grant Regional PSAP  
Three to Nine Communities Category Percentage, and FY 2023 Incentive Grant Regional  
Emergency Communications Center Category Percentage, D.T.C. 22-1*

Dear Secretary Green:

Enclosed please find the Attorney General's Notice of Intervention, Appearance of Counsel, and Certificate of Service. Please file according to your usual practice. Thank you for your assistance in this matter.

Sincerely,

*/s/ Jonathan F. Dinerstein*

Jonathan F. Dinerstein  
Assistant Attorney General

Enclosures

cc: William Bendetson, Presiding Officer  
Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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PETITION OF THE STATE 911	)	
DEPARTMENT FOR APPROVAL OF	)	D.T.C. 22-1
FISCAL YEAR ("FY") 2022	)	
EXPENDITURES, FY 2023	)	
DEVELOPMENT GRANT AMOUNT,	)	
FY INCENTIVE GRANT REGIONAL	)	
PSAP THREE TO NINE	)	
COMMUNITIES CATEGORY	)	
PERCENTAGE, AND FY 2023	)	
INCENTIVE GRANT REGIONAL	)	
EMERGENCY COMMUNICATIONS	)	
CENTER CATEGORY PERCENTAGE	)	
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**ATTORNEY GENERAL'S NOTICE OF INTERVENTION**

Maura Healey, as she is the Attorney General of the Commonwealth of Massachusetts, hereby gives notice of intervention as of right in the above-captioned matter under the authority specifically granted her by G.L. c. 12, §§10 and 11E and under her common law authority to represent and protect the public interest.

The Attorney General, as the chief law enforcement officer of the Commonwealth, has "broad common law and statutory powers to represent the public interest." *Commonwealth v. Mass CRINC*, 392 Mass. 79, 88 (1984); *see Sec'y of Admin. & Fin. v. Attorney General*, 367 Mass. 154, 159 (1975) (quoting *Commonwealth v. Kozlowsky*, 238 Mass. 379, 389 (1921)). "[T]he Attorney General has a general statutory mandate, in addition to any specific statutory mandate, to protect the public interest." *Mass CRINC*, 392 Mass. at 88 (citing G.L. c. 12, § 10); *see also Lowell Gas Co. v. Attorney General*, 377 Mass. 37, 48 (1979) (holding that the Attorney General has a "common law duty to represent the public interest and to enforce public rights"). The Attorney General's authority to protect the public interest applies to this administrative

proceeding, as the Legislature did not intend “to vary the power and duty of the Attorney General to control the conduct of litigation involving the interests of the Commonwealth depending on the forum in which he appears.” *Feeney v. Commonwealth*, 373 Mass. 359, 367 (1998). The Attorney General’s Office’s interpretation of its own authority should be given the same significant deference of any administrative agency in carrying out a power granted by the legislature. *Dowling v. Registrar of Motor Vehicles*, 425 Mass. 523, 525 (1997) (quoting *Mass. Med. Soc. v. Comm’r of Ins.*, 402 Mass. 44, 62 (1988)).

Respectfully submitted,

MAURA HEALEY  
ATTORNEY GENERAL

By: /s/ Jonathan F. Dinerstein  
Jonathan F. Dinerstein  
Assistant Attorney General  
Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200

Dated: March 30, 2022

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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**PETITION OF THE STATE 911  
DEPARTMENT FOR APPROVAL OF  
FISCAL YEAR ("FY") 2022  
EXPENDITURES, FY 2023  
DEVELOPMENT GRANT AMOUNT,  
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PSAP THREE TO NINE  
COMMUNITIES CATEGORY  
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INCENTIVE GRANT REGIONAL  
EMERGENCY COMMUNICATIONS  
CENTER CATEGORY PERCENTAGE**

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**D.T.C. 22-1**

**APPEARANCE OF COUNSEL**

Please enter my appearance on behalf of Maura Healey, the Attorney General of the Commonwealth of Massachusetts, in the above captioned proceeding.

Respectfully submitted,

MAURA HEALEY  
ATTORNEY GENERAL

By: /s/ Jonathan F. Dinerstein  
Jonathan F. Dinerstein  
Assistant Attorney General  
Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200

Dated: March 31, 2021

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

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EMERGENCY COMMUNICATIONS	)	
CENTER CATEGORY PERCENTAGE	)	
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I hereby certify that I have this day served the foregoing documents upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of 207 C.M.R. 1.05(1). Dated at Boston this 30<sup>th</sup> day of March, 2022.

/s/ Jonathan F. Dinerstein  
Jonathan F. Dinerstein  
Assistant Attorney General  
Massachusetts Attorney General  
Office of Ratepayer Advocacy  
One Ashburton Place  
Boston, MA 02108  
(617) 727-2200